

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CENTRAL LABORERS PENSION FUND, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 12 C 4182
)	
MIDWEST FIREPROOFING, LLC, an Illinois limited liability company,)	JUDGE MATTHEW F. KENNELLY
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, MIDWEST FIREPROOFING, LLC, an Illinois limited liability company, in the total amount of \$59,688.51, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$733.75.

On May 31, 2012, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to his receptionist, Kathy Pietrzyk) at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on June 21, 2012. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Cecilia M. Scanlon

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 18th day of July 2012:

Mr. Thomas J. Dwyer, Registered Agent
Midwest Fireproofing, LLC
Thomas J. Dwyer & Associates, Inc.
401 S. LaSalle Street, Suite 606
Chicago, IL 60605

/s/ Cecilia M. Scanlon

Cecilia M. Scanlon
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